

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**GLOBE LIFE AND ACCIDENT INSURANCE COMPANY'S RESPONSE TO  
PLAINTIFF'S MOTION TO COMPEL PAYMENT OF EXPERT'S FEE**

Defendant **Globe Life and Accident Insurance Company** (hereinafter “Globe” or “Defendant”) respectfully responds to the Plaintiff’s motion to compel Globe to pay a fee to Plaintiff’s expert John Allen as follows:

1. Globe did not and still does not believe it was obligated to pay said fee because, upon the entry of summary judgment in Globe's favor, this Court taxed costs to the Plaintiff.

2. Nevertheless, in an effort to quickly resolve this dispute, Globe has now paid the fee in question, which should make the Plaintiff's motion moot.

WHEREFORE, Globe respectfully requests that this Court deny the Plaintiff's motion to compel Globe to pay a fee to Plaintiff's expert John Allen as moot.

/s/Robert E. Poundstone IV  
Robert E. Poundstone IV (POU006)

**One of the Attorneys for Defendant Globe Life  
and Accident Insurance Company**

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**Attorneys for Defendant Globe Life and  
Accident Insurance Company**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 30th, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Christopher Sanspree, Esq.  
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and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: **None**.

s/Robert E. Poundstone IV  
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